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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 Plaintiff,

21 vs.

22 UBER TECHNOLOGIES, INC.;
23 OTTOMOTTO LLC; OTTO TRUCKING
24 LLC,

25 Defendants.

26 CASE NO. 3:17-cv-00939-WHA

27
28 **DECLARATION OF ANDREA PALLIOS
ROBERTS IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
PRÉCIS IN SUPPORT OF REQUEST TO
FILE MOTION FOR AN ADVERSE
INFERENCE JURY INSTRUCTION ON
ACCOUNT OF DEFENDANTS'
SPOILATION**

1 I, Andrea Pallios Roberts, declare as follows:

2 1. I am licensed to practice in the State of California and am admitted to practice before
3 this Court. I am an attorney at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for
4 the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal (the “Administrative Motion”) information in its October 23, 2017 Précis In Support Of
8 Request To File Motion For An Adverse Inference Jury Instruction On Account Of Defendants’
9 Spoliation (“Précis Regarding Spoliation”).

10 3. Waymo seeks to seal the highlighted portions of Waymo’s Précis Regarding
11 Spoliation because Defendants and/or Anthony Levandowski have designated the information
12 confidential and/or highly confidential. Waymo expects Defendants and/or Anthony Levandowski
13 to file one or more declarations in accordance with the Local Rules.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing
15 is true and correct, and that this declaration was executed in Redwood Shores, California, on October
16 23, 2017.

17 By /s/ Andrea Pallios Roberts

18 Andrea Pallios Roberts
19 Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Andrea Pallios Roberts.

/s/ Melissa J. Baily

Melissa J. Baily